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October 10, 2019

VIA ELECTRONIC CASE FILING

The Honorable Sarah Netburn, U.S. Magistrate Judge
United States District Court for the S.D.N.Y.
Thurgood Marshall U.S. Courthouse, Room 430
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03-MDL-1570 (GBD)(SN)
Ashton et al. v. al Qaeda Islamic Army, et al., 02-cv-6977 (GBD)(SN)
Bauer et al. v. al Qaeda Islamic Army, et al., 02-cv-7236 (GBD)(SN)
Ashton et al. v. Kingdom of Saudi Arabia, 17-cv-2003 (GBD)(SN)

Dear Judge Netburn:

We write this letter to seek the Court's permission to file a formal response to the bold lies, misrepresentations and accusations contained in the letter submitted this afternoon by Patricia Ryan and Kathryn Maher ("Ryan and Maher plaintiffs"). The Ryan and Maher plaintiffs submitted their October 10, 2019 letter in response to the Court's October 3, 2019 Order (Doc. No. 5186) purportedly as "evidence" that the Baumeister & Samuels attorneys "committed multiple acts of improper conduct" in an effort to create a basis to discharge the firm for cause and oppose our request for a charging lien against any future recoveries they may receive in connection with any litigation involving the September 11, 2001 terror attacks.

We respectfully request that the Court grant us an opportunity to address and challenge the many falsehoods contained in this letter which was submitted to the Court by the Ryan and Maher plaintiffs without even an acknowledgement that the submission was made under the penalty of perjury.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D. Capone', is written over a horizontal line.

Dorothea M. Capone

DMC:cml